



Hamilton Square 600 14th Street NW Suite 750 Washington DC 20005
T> 202-220-0400 F > 202-220-0401

October 15, 2002

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: *Review of the Section 251 Unbundling Obligations of Incumbent Local Exchange Carriers; Implementation of the Local Competition Provisions of the Telecommunications Act of 1996; Deployment of Wireline Services Offering Advanced Telecommunications Capability; WC Docket No. 01-338*

Dear Ms. Dortch:

On October 8, 2002, Verizon filed the attached statement in a proceeding instituted by the New York State Department of Public Service to examine Verizon's provision of access to high-capacity loop facilities to competitors. In its statement, Verizon states that there is no need for the New York D.P.S. to resolve disputes surrounding Verizon's "no facilities" policy for high-capacity loops, because the Federal Communications Commission will address these issues conclusively in the course of its *Triennial Review* proceeding.¹

Covad herewith submits this document for inclusion in the record in the above-referenced proceeding.

Respectfully submitted,

/s/ Praveen Goyal

Praveen Goyal
Senior Counsel for Government &
Regulatory Affairs

¹ See Attachment 1, Statement of Verizon New York Inc., *Proceeding on Motion of the Commission to Examine the Provision of High-Capacity Facilities by Verizon New York Inc.*, Case 02-C-1233, at 2-3 (filed Oct. 8, 2002).